

# **EXHIBIT 54**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS ) 03-MDL-1570 (GBD) (SN)  
ON SEPTEMBER 11, 2001 )  
 )

— — —

Friday, June 14, 2019

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CONFIDENTIAL MATERIAL

Redacted

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Videotaped Deposition of KHALIL  
al-KHALIL, held at 801 S. Figueroa Street,  
15th Floor, Los Angeles, California,  
commencing at 9:09 a.m., on the above date,  
before Debra A. Dibble, Certified Court  
Reporter, Registered Diplomate Reporter,  
Certified Realtime Captioner, Certified  
Realtime Reporter and Notary Public.

— — —

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1 Q. (BY MR. POUNIAN) Immediately  
2 after graduation from where?

3 A. From the College of Islamic Law  
4 in Riyadh.

5 Q. And what was your first  
6 government job at that time?

7 A. That was my first job.

8 Q. And what was the job, sir?

9 A. Was -- I was TA there. Was  
10 really TA in the college. Teaching  
11 assistant.

12 Q. And did you -- how long were  
13 you there, sir, after that?

14 A. The hierarchy there is like  
15 this. TA, then to be lecturer in the  
16 university, when you get your master, then  
17 when you get your Ph.D. to be assistant  
18 professor. And exactly that, I really went  
19 through all of this, three steps at the  
20 university.

21 Q. Did there come a time, sir,  
22 when you were employed by Saudi Arabia in  
23 some other capacity?

24 A. Not at all.

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1 Q. I'm sorry?

2 A. Not at all. No.

3 Q. Did there come a time, sir,  
4 when you were employed to work at the  
5 Saudi Arabian embassy?

6 A. Embassy, I wasn't really  
7 employed by them. I was with the university,  
8 Imam Mohammad Ibn Saud University. The  
9 ambassador asked the university for somebody  
10 for advice, so there was an arrangement  
11 between the university and the Saudi and the  
12 ambassador in Washington. So I was allowed  
13 or say dispatched to be -- for a while to be  
14 at the embassy as an advisor.

15 Q. And your title there, you say,  
16 was an advisor?

17 A. It's an advisor. They gave me  
18 a title of vice chairman of Islamic  
19 department.

20 Q. And what year did you start as  
21 the vice chairman of the Islamic department?

22 A. I started 1997, 16th of June.

23 Q. Did you say, sir, 1997? Or  
24 19 --

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1 A. Sorry, 1987.

2 Q. 1987.

3 A. '87. 16th of June.

4 Q. And you said you were  
5 working -- you were actually employed by  
6 the -- can we call it Imam U? Imam  
7 University, is that --

8 A. Imam Mohammad Bin Saud  
9 University.

10 Q. Is there a shorthand way of  
11 saying that so I don't have to use all of  
12 those words?

13 A. You shouldn't -- I don't know,  
14 there is no abbreviation in our country.

15 Q. All right. Could we say  
16 Imam University? Will you understand if I --

17 A. You say Imam Mohammad  
18 University.

19 Q. Okay. The Imam Mohammad  
20 University, who were you working for? You  
21 said you were actually working for them while  
22 you were in Washington DC?

23 A. Not working for them, working  
24 with the ambassador, but still my employment

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1       was connected with the university. My salary  
2       comes from the university, not from the  
3       embassy.

4           Q.        Okay. Who did you report to on  
5       a day-to-day basis during your work at the  
6       embassy in Washington DC?

7           A.        To the -- to the chairman. His  
8       Royal Highness Prince Mohammed bin Faisal,  
9       who was the president of that -- of that  
10      department.

11          Q.        The president of the department  
12      where?

13          A.        At the embassy.

14          Q.        And which department was that,  
15      the Islamic Affairs?

16          A.        The Department of Islamic  
17      Affairs.

18                   It was really newly established  
19      when I went there.

20                   MR. RAMIREZ: You've answered  
21      the question.

22          Q.        (BY MR. POUNIAN) And when was  
23      it established? In 1987?

24          A.        Exactly, yes.

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1 Q. And how many people staffed the  
2 Islamic Affairs department when you first  
3 went there?

4 A. Just the chairman and me at  
5 that time.

6 Q. And who did the chairman report  
7 to?

8 A. To the ambassador.

9 Q. And was the chairman also  
10 someone that came from the Imam Mohammad  
11 University at that time?

12 A. No.

13 Q. So he was working directly for  
14 the ministry of foreign affairs?

15 A. Yes, sir.

16 Q. And you mentioned the  
17 ambassador at that time was who?

18 A. His Royal Highness, Prince  
19 Bandar bin Sultan bin Abdulaziz Al Saud.

20 Q. And we can refer to him as  
21 Prince Bandar?

22 A. You can use any term you want.

23 Q. So am I correct that  
24 Prince Bandar, you had a relationship with

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1 him before you went to join the embassy?

2 A. No.

3 MR. RAMIREZ: Objection to  
4 form, but may answer if you  
5 understand.

6 Q. (BY MR. POUNIAN) You had no  
7 prior relationship with him?

8 A. I have no prior relation with  
9 him.

10 Q. And he asked you to join the  
11 embassy?

12 A. Yes.

13 MR. SHEN: Objection to form.

14 Q. (BY MR. POUNIAN) And can you  
15 explain the circumstances of that?

16 A. Indeed he came to visit 1985,  
17 students, as usual when he became ambassador.  
18 I met with him at the reception, shaked his  
19 hand. And there was the consulate here in  
20 Los Angeles. One of them was a prince. So  
21 he made some remarks, good remarks about me.  
22 Then immediately his royal highness said I  
23 would like to see you in Washington, is it  
24 possible. I said yes. He said in a month,

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1       would like to meet with you. I met with him,  
2       then he offered me the job.

3           Q.       And did he explain to you what  
4       the job would be?

5           A.       Yes.

6           Q.       And what did he say to you?

7           A.       Just to be about -- because  
8       indeed let me tell you this quickly. I  
9       proposed to him some issues related to the  
10      Saudi/America relation, that this relation  
11      has to be really grounded and also to have  
12      some other issues, not only the political  
13      side, which means to have good relationship  
14      with universities, good relation with some  
15      entities around the United States of America,  
16      so students and those American students could  
17      go or some American young students could go  
18      to study in the Saudi Arabia, could visit.

19           So it was like proposing to him  
20      publicly, the public relation. And he  
21      accepted it. And he said, Well, as long as  
22      you are aware of these issues, I would ask  
23      you to come and work with me. And this also,  
24      I complain to him that some settlers were not

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1       really treated in the right way when they  
2       come for medical treatment or come for some  
3       issues. So he really liked that idea and  
4       asked me to join with him to help in these  
5       matters.

6           Q.       And you were part of the  
7       Islamic Affairs department? Is that correct?

8           A.       I don't understand your  
9       question. What's your question, please?

10          Q.       Let me strike the question. As  
11       part of your job at the Islamic Affairs  
12       department, did you have any responsibilities  
13       to oversee other Saudi government employees  
14       inside the United States?

15          A.       Employees, no. But to justice  
16       was like a public relation, with mosques,  
17       with Muslims who are around the --  
18       particularly at that time, Iran was really a  
19       big issue to Saudi Arabia, and they were  
20       really preaching the Khomeinism. And Saudis  
21       were so concerned that they may have an  
22       influence on the Muslims of the  
23       United States, whether Arabs or not Arabs.

24                   Because of my background, that

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1 I graduated from Islamic college, because of  
2 my good relation with students and other also  
3 minorities, Muslim minorities like  
4 African-American Muslims, the really main job  
5 in that department is to create good relation  
6 between the embassy and other Muslims around  
7 groups, regardless of nationality or color,  
8 but not the employee.

9 Q. (BY MR. POUNIAN) So you  
10 interacted with mosques inside the United  
11 States?

12 A. Yes.

13 Q. And all throughout the  
14 United States; is that correct?

15 A. Yes, sir.

16 Q. And did you help them with  
17 personnel in any way --

18 MR. RAMIREZ: Objection.

19 Q. (BY MR. POUNIAN) -- to staff  
20 the mosques?

21 MR. RAMIREZ: Objection to  
22 form, but you may answer.

23 THE WITNESS: Not -- no.

24 Q. (BY MR. POUNIAN) And in no way

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1 did you --

2 A. No.

3 Q. In no way were you involved  
4 with the staffing of any mosques around the  
5 United States; is that correct?

6 A. No, yes.

7 Q. Were you involved with the  
8 funding of mosques anywhere around the  
9 United States?

10 A. If there are request from,  
11 there are -- yes, is the answer.

12 Q. And in what way were you  
13 involved with funding of mosques around the  
14 United States?

15 A. If there are some needs for  
16 financial assistance or something to be fixed  
17 in the mosque or someone who is imams or  
18 needs some medical treatment or they were to  
19 go to Saudi Arabia for performing hajj or  
20 umrah -- I'm not sure if you are familiar  
21 with these two terms -- go to Mecca, and  
22 sometimes they send to be hosted in  
23 Saudi Arabia; and Prince Bandar was busy. So  
24 that department used to handle some of these

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1 issues. Which means assistance. Assisting  
2 others.

3 Q. Now, when you were in this job  
4 for Islamic Affairs department, were you a  
5 diplomat for Saudi Arabia?

6 MR. SHEN: Objection to form.

7 MR. RAMIREZ: Join.

8 THE WITNESS: I became a  
9 diplomat after two years.

10 Q. (BY MR. POUNIAN) And when did  
11 you become a diplomat?

12 A. I think '89. Something like  
13 that. I was given diplomat to get passports  
14 and et cetera, et cetera, to facilitate my  
15 traveling.

16 Q. When you first came to the  
17 United States, what type of visa did you  
18 have --

19 A. Student visa.

20 MR. RAMIREZ: Again, let him  
21 ask the question completely. The  
22 court reporter can only take one  
23 person at a time.

24 Thank you.

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1 Q. (BY MR. POUNIAN) So you  
2 arrived in the United States with a student  
3 visa. And did you work for the Islamic  
4 Affairs department at the embassy with a  
5 student visa?

6 A. For a while, because there  
7 were -- it's like assisting. It's like  
8 volunteer work. It wasn't really -- it  
9 wasn't really hiring or wasn't really with  
10 formality. It was university, the one that  
11 giving me or sending me the money, not the --  
12 not the embassy.

13 And that was, by the way, a way  
14 of Prince Bandar doing that, recruited some  
15 students to him just to help him. One of  
16 them was Adel Al-Jubier. One of them was  
17 Rihab Massoud; who became ministers. Because  
18 he was thinking that it's training for the  
19 students also to be at the Saudi embassy for  
20 a while.

21 Q. So you became a diplomat in --

22 A. About 1989.

23 Q. -- 1989?

24 A. Yeah.

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1 is that correct?

2 A. In the university or any person  
3 in the government, every year they will be, I  
4 think two percent or something for the  
5 salary. Any person. Regardless of who you  
6 are. So that's settled with the government.  
7 So I got that one.

8 Q. You received no pay increases  
9 because of your performance; is that correct?

10 MR. RAMIREZ: Objection,  
11 misstates his testimony. But you may  
12 respond if you understand.

13 THE WITNESS: I didn't really  
14 understand that question, and it's not  
15 relevant to me.

16 Q. (BY MR. POUNIAN) Well, my  
17 question is, did you get any pay increase  
18 because of the good work that you were doing?

19 A. No.

20 Q. And were you evaluated for your  
21 work by anyone inside the government while  
22 you were at the embassy?

23 A. No.

24 Q. You didn't get any job

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1 evaluations at all?

2 A. No. I am not supposed to be  
3 evaluated. The university sending me. If  
4 they are not happy, they can just send me --  
5 get me back. That's it.

6 Q. And as part of your job at the  
7 ministry -- excuse me. As -- strike the  
8 question.

9 As part of your job with the  
10 Islamic Affairs department, did you interact  
11 with the Ministry of Islamic Affairs?

12 A. No.

13 Q. In 1993, was there a Ministry  
14 of Islamic Affairs formed by Saudi Arabia?

15 MR. RAMIREZ: Objection as to  
16 form.

17 THE WITNESS: Your question  
18 again, please.

19 Q. (BY MR. POUNIAN) Do you recall  
20 that in 1993 there was a Ministry of Islamic  
21 Affairs formed by the government of  
22 Saudi Arabia?

23 A. Yeah, I recall that.

24 Q. And do you recall at that time,

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1 after that time, while you were at the  
2 embassy, working with any officials within  
3 the Ministry of Islamic Affairs?

4 A. No.

5 Q. Were there representatives of  
6 the Ministry of Islamic Affairs at the  
7 embassy in Washington while you were in  
8 Washington?

9 A. Yes.

10 Q. And who were the  
11 representatives of the Ministry of Islamic  
12 Affairs in Washington at that time?

13 A. During my time, the one who  
14 really established the office, a gentleman, a  
15 man, his name was Saleh.

16 Q. And did he have a staff?

17 A. I think yes.

18 Q. And who else can you recall was  
19 working in that office headed by Mr. Saleh?

20 A. I forget all the names.

21 Q. And was Mr. Saleh eventually  
22 replaced by anyone else that you can recall?

23 A. I left the embassy when he was  
24 the chairman. I am not aware of the others.

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1 Q. So you have no recollection  
2 yourself as you're sitting here today of any  
3 person who worked for the Ministry of Islamic  
4 Affairs at the embassy in Washington for --

5 A. Just --

6 Q. I'm just -- let me finish.

7 A. Go ahead.

8 Q. -- other than Mr. Saleh?

9 A. I could now imagine some faces,  
10 but I can't recall the names, honestly.

11 Q. Did you know Khalid  
12 al-Sowailem?

13 A. Yes.

14 Q. And who was Khalid al-Sowailem?

15 A. I heard he was the person who  
16 came after Saleh, but I never interacted with  
17 him.

18 Q. And he would have come in  
19 around the -- you said around 1996; is that  
20 correct? Mr. al-Sowailem?

21 MR. SHEN: Objection to form.

22 THE WITNESS: I don't know.

23 Q. (BY MR. POUNIAN) Well, you  
24 said he came in around the time you left.

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1 Q. And you said you called the  
2 deputy minister of Islamic Affairs  
3 department.

4 A. Yes. To inform about it.

5 Q. And who was that person that  
6 you spoke with?

7 A. His eminence Sheik Abdul Aziz  
8 al-Ammar.

9 Q. And where is he located?

10 A. In Riyadh, Saudi Arabia.

11 Q. And why did you call him?

12 A. I was concerned about the  
13 mosque.

14 Q. I understand that, but why did  
15 you call him as opposed to someone else  
16 within the government? What was -- what was  
17 the reason you called him out of all the  
18 people in the government?

19 A. First, because I know him. We  
20 were colleague in the university. Graduated  
21 the same day from the university and back  
22 home in Kingdom of Saudi Arabia.

23 Second, he was the deputy  
24 minister for Islamic affairs abroad.

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1 International issues.

2 Q. Did there come a time when you  
3 expelled Thumairy from the mosque?

4 A. Fahad Thumairy wasn't expelled  
5 from the mosque.

6 Q. Was he given any instructions  
7 or any directions to limit certain  
8 activities?

9 A. Yes.

10 Q. And what instructions was he  
11 given?

12 A. Instruction was from me talking  
13 to him that I wanted him to be -- not to host  
14 Saudis, particularly when they come to the  
15 mosque, without permission from me.

16 Those who comes for preaching,  
17 particularly those who come for preaching,  
18 say those who come who claim that they're  
19 preaching, I don't want you to host them at  
20 the mosque without permission.

21 Q. And when did you give that  
22 instruction to Fahad al-Thumairy?

23 A. My recollection was in  
24 August 19th -- 2001.

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1 Q. And before 9-11; is that  
2 correct?

3 A. Before 9-11, yeah.

4 Q. And you were in Los Angeles at  
5 the time?

6 A. I was in Los Angeles.

7 Q. And why did you give Fahad  
8 al-Thumairy those instructions?

9 A. That's really interesting.  
10 Because there were three guys came visiting.  
11 I met with them at the mosque, by chance. I  
12 asked them when did they arrive. They told  
13 me three days ago. Then I really try to host  
14 them for dinner. They said okay. We'll talk  
15 with Fahad al-Thumairy. And I said, did you  
16 meet with Fahad al-Thumairy? They said yes.

17 Anyway, just because of my  
18 curiosity as a Saudi, and no one goes to  
19 tuition at kingdom of Saudi Arabia that there  
20 was really -- they were sigma of young and  
21 sigma of preachers who were extremists.

22 I noticed that those guys were  
23 not -- I mean, I was just surprised three who  
24 are coming, if they were coming officially,

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1 Q. (BY MR. RAMIREZ) Join, but you  
2 may answer if you understand.

3 A. Your question again?

4 Q. Did you have an understanding  
5 that when he was giving prayers at the mosque  
6 or working at the mosque, that he was being  
7 paid by Saudi Arabia?

8 A. He was a student. That's my  
9 understanding.

10 Q. So am I correct, sir, that what  
11 you're saying is that his work at the mosque,  
12 what he was doing at the mosque, had nothing  
13 do with his employment by Saudi Arabia?

14 MR. SHEN: Objection to the  
15 form.

16 THE WITNESS: That's my  
17 understanding. He was a volunteer at  
18 the masjid; at the mosque.

19 Q. (BY MR. POUNIAN) So he was not  
20 working for Saudi Arabia when he was at the  
21 mosque; is that right?

22 MR. SHEN: Objection --

23 THE WITNESS: That's my  
24 understanding.

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1 MR. SHEN: -- to the form.

2 Q. (BY MR. POUNIAN) Now, you said  
3 that before, that the main -- you called him,  
4 Mr. Shuaib, the main Imam at the mosque?

5 A. Yes.

6 Q. Were there other imams at the  
7 mosque?

8 MR. RAMIREZ: Objection as to  
9 form, but you may answer if you  
10 understand.

11 THE WITNESS: There are two or  
12 three for -- you know, three imams who  
13 were then imams, not there. One of  
14 them would lead the prayer.

15 Q. (BY MR. POUNIAN) So who are  
16 the other imams?

17 A. I can't recall the names. From  
18 the community. And they are really  
19 different, you know. Every time there is  
20 different person living in the neighborhood  
21 or even visiting. Then they will ask him to  
22 lead the prayer.

23 Q. Was Fahad Thumairy ever the  
24 imam of the King Fahad Mosque?

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1                   A.        He wasn't the imam, but he used  
2                    to lead the prayer sometimes.

3                   Q.        Was he ever considered an imam  
4                    at the mosque?

5                   A.        Others may consider him,  
6                    because when somebody like him with  
7                    qualification of Islamic studies, some people  
8                    immediately called him imam or something, but  
9                    particularly when he led some prayers.    But  
10                   it's not to us that he is an imam or  
11                   something like that.

12                  Q.        So you did not consider him the  
13                  imam at the mosque --

14                  A.        Yes.

15                  Q.        -- is that correct?

16                  A.        That's correct.

17                  Q.        Do you recall having  
18                  discussions with anyone in the Saudi  
19                  government regarding having the Ministry of  
20                  Islamic Affairs send imams to work at the  
21                  mosque?

22                  A.        I can't recall any discussion.

23                  Q.        Okay.    Do you think you would  
24                  have ever had such a discussion?

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1                   A.        I -- everything is possible. I  
2        don't know.

3                   Q.        Was Fahad Thumairy paid by the  
4        King Fahad Mosque?

5                   A.        No.

6                   Q.        Did he receive any money from  
7        the King Fahad Mosque?

8                   A.        Yes.

9                   Q.        And what money did he receive?

10                  A.        As a volunteer person,  
11        frequently he received some money as  
12        compensation for some of his work. Some of  
13        his -- what he did as a volunteer. Like  
14        others. Volunteers, when they work for  
15        something in the mosque, or particularly  
16        Ramadan, the month of fasting, if there are  
17        many works or something, then there would be  
18        some payment for the volunteers.

19                  MR. RAMIREZ: Would you like  
20        him to move his mic?

21                  Q.        (BY MR. POUNIAN) Do you recall  
22        telling the 9-11 commission that Fahad  
23        Thumairy was part of the leadership of the  
24        mosque?

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1                   they wrote that he had this title. He  
2                   had that title. So I was surprised.

3                   Q.           (BY MR. POUNIAN) And why were  
4                   you surprised?

5                   A.           Because, to my best knowledge,  
6                   he was just a student.

7                   Q.           So you had no idea that he had  
8                   any employment relationship with Saudi  
9                   Arabia?

10                  MR. SHEN: Objection to form.

11                  THE WITNESS: He was an  
12                  employee in the Ministry of Islamic  
13                  Affairs -- with the Ministry of  
14                  Islamic Affairs back home, but not  
15                  other positions here in the  
16                  United States.

17                  Q.           (BY MR. POUNIAN) Did you  
18                  understand that he was working here in the  
19                  United States for the Ministry of Islamic  
20                  Affairs?

21                  A.           No, I didn't.

22                  Q.           I mean, could he have worked  
23                  for the Ministry of Islamic Affairs in the  
24                  United States --

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1 MR. RAMIREZ: Objection.

2 MR. SHEN: Objection as to  
3 form.

4 THE WITNESS: I didn't know.

5 Q. (BY MR. POUNIAN) Well, I'm  
6 saying legally, you -- did you understand  
7 that it was not proper for a Saudi government  
8 official to be working in the United States?

9 MR. RAMIREZ: Objection as to  
10 form.

11 MR. SHEN: Objection to form.

12 Q. (BY MR. POUNIAN) Unless they  
13 were a diplomat or unless they had some  
14 authority from the U.S. government to do so?

15 MR. RAMIREZ: Objection to the  
16 form.

17 MR. SHEN: Objection to the  
18 form.

19 THE WITNESS: I didn't know  
20 anything about that.

21 Q. (BY MR. POUNIAN) Do you recall  
22 an occasion in which you met Osama bin Laden?

23 A. Yes.

24 Q. And how many times did you meet

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1       Osama bin Laden?

2           A.       One time.

3           Q.       And where was that?

4           A.       In Jeddah.

5           Q.       In Saudi Arabia?

6           A.       In Saudi Arabia.

7           Q.       And how did it -- how did it --  
8       strike the question.

9                    Can you tell us the  
10          circumstances of that meeting?

11          A.       My best recollection, I was  
12       invited for lunch one day, not knowing who  
13       would be there, by a friend, and met with  
14       him. You know, he was there.

15          Q.       Who invited you?

16          A.       My boss. It was Mohammed  
17       al-Faisal.

18                    He was in Jeddah at that time.

19          Q.       And your boss at Imam  
20       University or your boss within the ministry  
21       of foreign affairs?

22          A.       He was my boss at the embassy.

23          Q.       Okay. Your boss at the embassy  
24       in Washington DC?

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1 A. Washington DC.

2 Q. And he was giving you --

3 inviting you to this meeting while -- were  
4 you both in Jeddah at the time?

5 A. I was in Riyad, he was in  
6 Jeddah, so I received the call from him,  
7 inviting me for a lunch.

8 Q. And why were you invited to  
9 that particular lunch?

10 MR. RAMIREZ: Objection as to  
11 form, but if you know.

12 Q. (BY MR. POUNIAN) Were you told  
13 why you were invited to that lunch?

14 A. Yes. He told me.

15 Q. What did he tell you?

16 A. Before, when I arrived, he said  
17 there is a -- he said there is a person who  
18 was really, to him, is really something, you  
19 know, that asked him to meet with him. The  
20 guy asked to meet with this prince, through a  
21 friend also that I didn't know.

22 Then he invited me to be with  
23 him for assessments after the meeting.

24 Q. And can you tell us what

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1       happened at the meeting? Who was at the  
2       meeting other than you and Mr. Bin Ladin?

3           A.        There was a sheikh. One of the  
4       scholars who was also invited without knowing  
5       who was their guest.

6           Q.        And when you say he was a  
7       scholar, do you mean an Islamic scholar?

8           A.        Yes.

9           Q.        And was he from the -- from the  
10       government?

11          A.        No. He was working with Muslim  
12       World League.

13          Q.        And do you recall the name of  
14       this Islamic scholar?

15          A.        You want his name?

16          Q.        Yes.

17          A.        His name is Dr. Abdullah  
18       Mussala. (Phonetic)

19          Q.        And why was he invited to the  
20       meeting? Do you know?

21          A.        My interpretation because he  
22       was a scholar, enlightened scholar, and  
23       probably he -- I don't know, really, what it  
24       was the cause, but my interpretation, because

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1 he was a scholar.

2 Q. Okay.

3 A. In Islamic issues.

4 Q. So can you tell us what was  
5 said at the meeting to the best of your  
6 recollection?

7 A. Yes. When Bin Laden came, he  
8 immediately mentioned that he first of all  
9 doesn't recognize Saudi Arabia, he doesn't  
10 want to use -- he didn't want to -- he asked  
11 the prince, in August, you are a prince, but  
12 I'm not recognizing your family as royal  
13 family. I'm not recognizing, he said, that  
14 king as a king. I'm not recognizing the  
15 crown prince as a crown prince. So I was  
16 just name you. I will talk by names, Fahad,  
17 Abdullah and you, the prince, Mohammed.

18 He said the prince why? He  
19 said, because I don't recognize that, this  
20 government instrument.

21 Then he started talking, he  
22 said, my purpose of asking this meeting is to  
23 facilitate to meet with one of your uncles,  
24 King Fahad or Abdullah. That was his

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1 request.

2 Q. When was this meeting?

3 A. At the end of my recollection,  
4 this recollection, it was at the end of  
5 August 1990.

6 One month -- about one month  
7 after the invasion of Saddam Hussein, the  
8 president of Iraq, his invasion of Kuwait.  
9 To Kuwait.

10 Q. And who is Prince Mohammad bin  
11 Faisal?

12 A. As I mentioned to you, he was  
13 the director of Islamic affairs department at  
14 the embassy.

15 Q. And was he the son of King  
16 Faisal?

17 A. No.

18 Q. Do you recall telling the 9-11  
19 Commission that the mosque needed permission  
20 from the consulate to perform a wedding?

21 MR. RAMIREZ: Object as to  
22 form, but you may answer if you know.

23 THE WITNESS: Consul general  
24 asked Sheikh Shuaib, based on what he

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1 told me, that kindly not to perform  
2 marriages for Saudis without -- not  
3 permission, but without the knowledge  
4 and the acknowledgment of the  
5 consulate. It was a request, kind  
6 request.

7 MR. POUNIAN: I'd like to take  
8 a break, but I want to ask a question  
9 first that requires us to use an FBI  
10 document. So why don't I do that now.  
11 Why don't the people that don't have  
12 the okay, leave the room.

13 People on the phone, anyone who  
14 does not have the approval to see the  
15 FBI documents.

16 MS. CAPONE: When should we  
17 dial back in?

18 MR. POUNIAN: In about 15  
19 minutes.

20 MS. CAPONE: Okay. 3:15. All  
21 right. Well, you guys, 3:15. I'll  
22 dial back in at that time. Thanks.

23 MR. COTTREAU: I'm just going  
24 to note my absence for the record with

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1 Q. (BY MR. CARTER) Dr. Khalil, I  
2 just have a few more questions.

3 You testified earlier that you  
4 had been delegated for a number of years from  
5 the Imam Mohammed Ibn Saud University to the  
6 embassy in Washington; correct?

7 A. Yes, sir.

8 Q. And during that period, did you  
9 encounter a man named Abdullah bin Laden at  
10 all?

11 A. I can't recall.

12 Q. You don't know whether there  
13 was a person named Abdullah bin Laden who,  
14 like you, had been delegated from Imam  
15 Mohammad Ibn Saud University to the embassy?

16 A. I don't know about him.

17 Q. You don't know who he is?

18 A. I don't know who he is.

19 MR. CARTER: That's all I have.

20 Thank you.

21 THE WITNESS: Anytime.

22 CROSS EXAMINATION

23 BY MR. SHEN:

24 Q. Good afternoon, Dr. Khalil.

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1 A. Good afternoon, Mr. Shen.

2 Q. My name is Andy Shen. I'm the  
3 lawyer for the Kingdom of Saudi Arabia. I  
4 have just a few questions for you and we'll  
5 get you on your way this afternoon.

6 A. Thank you.

7 Q. The plaintiffs in this lawsuit  
8 have made an allegation that senior Saudi  
9 officials provided instructions to Fahad  
10 al-Thumairy and Omar al-Bayoumi to assist the  
11 two California hijackers, Nawaf al-Hazmi and  
12 Khalid al-Mihdhar. Do you have any  
13 information whatsoever that any senior Saudi  
14 official provide any instruction to Thumairy  
15 to assist the two California hijackers?

16 A. No.

17 Q. Do you have any information  
18 whatsoever that Fahad al-Thumairy provided  
19 instructions to anybody else to assist the  
20 two California hijackers?

21 A. No, sir.

22 Q. Do you have any information  
23 whatsoever that any senior Saudi official  
24 instructed Omar al-Bayoumi to assist the

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1 California hijackers?

2 A. No, sir.

3 Q. Do you have any information  
4 that Omar al-Bayoumi instructed anybody to  
5 assist the California hijackers?

6 A. No.

7 Q. Are you aware of any Saudi  
8 support whatsoever to the California  
9 hijackers?

10 A. No.

11 Q. Are you aware of any support  
12 that Muhanna -- strike that.

13 Are you aware of any  
14 instruction from any senior Saudi official  
15 that Mohammed al-Muhanna was to assist the  
16 California hijackers?

17 A. Can you read again the  
18 question? Because she was coughing. I  
19 couldn't get it.

20 Q. Are you aware of any  
21 instruction provided by a senior Saudi  
22 official to Mohammed al-Muhanna to assist the  
23 two California hijackers?

24 A. No, I didn't know anything

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1 about it.

2 Q. Are you aware of any  
3 instructions that al-Muhanna provided to  
4 anybody to assist the two California  
5 hijackers?

6 A. I don't know.

7 Q. Are you aware of any assistance  
8 that al-Muhanna provided to the two  
9 California hijackers?

10 A. I'm not aware of that.

11 Q. You were asked certain  
12 questions today about Ismail Mana. Do you  
13 have any information about any instructions  
14 that Mr. Mana was given by senior Saudi  
15 officials to assist the two hijackers?

16 A. Not at all.

17 Q. Do you have any information  
18 that Mr. Mana instructed anybody else to  
19 assist the two hijackers?

20 A. No, I don't.

21 Q. Do you have any information  
22 that Mr. Mana assisted the two hijackers in  
23 any way, shape, or form?

24 A. No, I don't.

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1                   Q.         Now, plaintiffs have made the  
2        allegation that the King Fahad Mosque was  
3        somehow used as a conduit by the Kingdom of  
4        Saudi Arabia to assist the two California  
5        hijackers.  Is there any truth to that  
6        allegation?

7                   MR. POUNIAN:  Objection to the  
8        question.

9                   THE WITNESS:  No truth.  
10                  Absolutely false.

11                  Q.         (BY MR. SHEN)  I'm going to ask  
12        you to take out some of the exhibits that we  
13        looked at earlier today.

14                  If you could, sir, take out  
15        Exhibit 194.

16                  Exhibit 194, Bates stamped KFM  
17        420.  This is a letter from yourself dated  
18        July 12, 1995, to Prince Abdul Aziz.  Do you  
19        see that?

20                  A.         Yes.  Just give me a second,  
21        please.

22                  [Document review.]

23                  Q.         (BY MR. SHEN)  The second  
24        paragraph of Exhibit 194, plaintiffs' counsel

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1 asked you to look at language that says: I  
2 would like to inform you that this foundation  
3 is the extension of the activities of the  
4 kingdom and is a part of its organizations.

5 Do you see that language?

6 A. Yes.

7 Q. And you testified that this  
8 foundation is the Ibn Taymiyyah Foundation;  
9 correct?

10 A. Yes.

11 Q. Of which you're the chairman;  
12 correct?

13 A. Yes.

14 Q. And the statement that the Ibn  
15 Foundation is part of its organizations, was  
16 the Ibn Taymiyyah Foundation part of the  
17 Kingdom of Saudi Arabian government?

18                   A.        It is not part of Saudi Arabia  
19                   government.

20 Q. In fact, the Ibn Taymiyyah  
21 Foundation is completely independent of the  
22 Saudi Arabian government: correct?

23 A. That's correct.

24 Q. And that was true in 1995;

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1       Saudi Arabia?

2           A.       That's what I believe -- was  
3       told, but I have no idea, one of them that  
4       was working. It just views, these are about  
5       issues, political issues, and, you know, we  
6       just, we tried in the mosque not to  
7       accommodate those people if they have strong  
8       views about -- against Saudi Arabia and  
9       countries.

10          Q.        Okay. And your understanding  
11       was that those three individuals had strong  
12       views against Saudi Arabia?

13          A.        One of them. I'm not sure  
14       about the others. But one of them said some  
15       views in the discussion, and it's really to  
16       us not tolerable.

17                MR. SHEN: I have no further  
18       questions. Thank you very much.

19                THE WITNESS: Oh, I appreciate  
20       it. Thank you very much.

21                (Khalil Deposition Exhibit 211,  
22       Note, Subject: Fahd Al-Thuairy,  
23       KSA0000006861, was marked for  
24       identification.)

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1 [Document review.]

2 REDIRECT EXAMINATION

3 BY MR. POUNIAN:

4 Q. Have you seen this document  
5 before, sir?

6 A. No.

7 Q. Have you seen the information  
8 in this document before?

9 A. Not really. Not -- no.

10 Q. No?

11 A. Yes.

12 Q. This is a U.S. government  
13 document that was prepared as part of the  
14 9-11 investigation and produced to the  
15 plaintiffs in this litigation.

16 A. Okay.

17 MR. SHEN: Objection to the  
18 form, objection to the  
19 characterization of the document.

20 Q. (BY MR. POUNIAN) Now, were you  
21 aware, sir, that al-Thumairy and al-Muhanna  
22 were believed to have been ordered expelled  
23 from the mosque because they had extremist  
24 views and cultivated extremist followers?

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1 MR. RAMIREZ: Objection to the  
2 form.

3 MR. SHEN: This goes beyond the  
4 scope of the cross.

5 THE WITNESS: Should I answer?

6 MR. RAMIREZ: Yes, you can  
7 answer.

11 They were -- Muhanna was asked not to  
12 conduct meetings, activities, or  
13 teaching or meeting people or asking  
14 them or making the mosque like a point  
15 for him to meet other people. That's  
16 what happened.

17 Q. (BY MR. POUNIAN) Do you recall  
18 that they were categorized as extremists  
19 within the mosque?

20 MR. RAMIREZ: Objection as to  
21 form. Assumes facts not in evidence,  
22 but you can go ahead and answer if you  
23 know.

24 MR. SHEN: Objection, beyond

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1 the scope.

2 THE WITNESS: Can you repeat  
3 the question? I couldn't understand  
4 it.

5 Q. (BY MR. POUNIAN) Do you recall  
6 that there were followers of Thumairy and  
7 Muhanna within the mosque, persons who  
8 followed them as -- as Islamic believers,  
9 they viewed them -- they were followers of  
10 them within the mosque?

11 MR. RAMIREZ: Objection as to  
12 form.

13 MR. SHEN: Objection to form.  
14 Objection to the scope.

15 THE WITNESS: I can't answer  
16 this question. I didn't know who is  
17 following whom.

18 Q. (BY MR. POUNIAN) Okay. So are  
19 you aware of any followers of al-Thumairy and  
20 al-Muhanna within the mosque?

21 A. No, I didn't.

22 MR. SHEN: Objection to the  
23 form, objection to scope.

24 THE WITNESS: No, I didn't

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1 know.

2 Q. (BY MR. POUNIAN) Did you  
3 provide this information to the FBI?

4 MR. SHEN: Objection.

5 THE WITNESS: Did I --

6 MR. RAMIREZ: Hold on.

7 Objection as to form. Assumes facts  
8 not in evidence, but provide an  
9 answer.

10 MR. POUNIAN: Objection.

11 THE WITNESS: No answer.

12 MR. RAMIREZ: No, you can  
13 answer if you know.

14 THE WITNESS: Question again?

15 Q. (BY MR. POUNIAN) Did you  
16 provide any of the information that's in this  
17 document to the Federal Bureau of  
18 Investigation?

19 A. I can't recall.

20 Q. You can't recall?

21 A. Yeah.

22 Q. So it's possible that you did  
23 provide some of this information to them?

24 MR. SHEN: Objection to form.

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Page 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS ) 03-MDL-1570 (GBD) (SN)  
ON SEPTEMBER 11, 2001 )  
                          )

— — —

Friday, June 14, 2019

— — —  
THIS TRANSCRIPT CONTAINS  
CONFIDENTIAL MATERIAL

Redacted

— — —

Videotaped Deposition of KHALIL al-KHALIL, held at 801 S. Figueroa Street, 15th Floor, Los Angeles, California, commencing at 9:09 a.m., on the above date, before Debra A. Dibble, Certified Court Reporter, Registered Diplomate Reporter, Certified Realtime Captioner, Certified Realtime Reporter and Notary Public.

— — —

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Page 418

## 1 ERRATA

2 PAGE LINE CHANGE

3 12 19 Because of parking violation4 REASON: missing words5 13 4 concept6 REASON: missing word7 14 6 Ph.D.8 REASON: missing word9 18 13 an advisor10 REASON: missing word11 37 17 bin Faisal12 REASON: name correction13 44 20 from 2005-200914 REASON: dates not written correctly15 49 7 not obligated16 REASON: "delegated" mistakenly written17 58 1 no opportunity18 REASON: the word "no" was left out19 67 16 work in the country like others20 REASON: missing word21 107 12 but I mean he met with them22 REASON: missing word23 143 5 Muhammad ibn Abdul Wahhab24 REASON: name correction

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Page 418 (b)

1 ERRATA

2 PAGE LINE CHANGE

3 146 23 picture on the wall

4 REASON: remove the word "but"

5 156 5 letter from the donor's office

6 REASON: missing word

7      23      24      visitors

8 REASON: visitors instead of settlers

9 164 14 discussions

10 REASON: missing word

12 REASON: mistake in name

100 [About](#) [Help](#) [Privacy](#) [Terms](#) [Sitemap](#)

14 REASON: missing "i"

— 1 —

<sup>17</sup> See, for example, the discussion of the 1994 Constitutional Conference in the *Journal of African Law* 38 (2004).

\_\_\_\_\_

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\_\_\_\_\_

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— — — — —

## INTERVIEW WITH THE LEADERSHIP

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REASON MISSING WOMAN

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Page 418 (c)

1 ERRATA

2 PAGE LINE CHANGE

3 209 21 one who started the discussion

4 REASON: missing word

5 224 21 Islamic Foundation

6 REASON: Islamic instead of Islam

7 225 17 to be on the board of trustees

8 REASON: missing words

9 226 6 can't remember the date

10 REASON: missing words

11 236 9 the board instructed management not  
to led him teach or lead prayers

12 REASON: clarity

13 237 12 we know his kids

14 REASON: missing word

15 238 6 we asked him

16 REASON: not we ask you

17 238 21 should not go to school

18 REASON: add "not"

19 246 20 institution

20 REASON: institution instead of instrument

21 266 24 uncles Fahad or Abdullah

REASON: without word "King"

23 281 14 smooth

24 REASON: smooth instead of sooth

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Page 418 (d)

## 1 ERRATA

## 2 PAGE LINE CHANGE

3 288 19 my colleagues  
4 REASON: my colleagues instead of Islam  
college5 289 9 our foundation  
6 REASON: our instead of some7 294 7 endowment  
8 REASON: endowment instead of government9 294 6 just nearby  
10 REASON: remove "not"11 294 13 Yes  
12 REASON: Yes instead of No13 299 11 I just noticed  
14 REASON: missing word15 316 22 second time  
16 REASON: time instead of point17 336 16 to build for them  
18 REASON: missing words19 337 9 to oversee  
20 REASON: oversee instead of see21 346 4 run into  
22 REASON: run into instead of plan23 347 1 scholar  
24 REASON: scholar instead of cattle

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1 ACKNOWLEDGMENT OF DEPONENT

2

3

4

5 certify that I have read the foregoing pages  
6 and that the same is a correct transcription  
7 of the answers given by me to the questions  
therein propounded, except for the  
corrections or changes in form or substance,  
if any, noted in the attached  
Errata Sheet.

8

9

0

1

2

## KHALIL AL-KHALIL

DATE

13

14

15

16      \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_.

17 My commission expires: \_\_\_\_\_

18

10

Notary Public

21

22

23

24